

# **EXHIBIT 4**

**KIRKLAND & ELLIS LLP**

AND AFFILIATED PARTNERSHIPS

200 East Randolph Drive  
Chicago, Illinois 60601

Michael T. Dierkes  
To Call Writer Directly:  
312 861-2353  
mdierkes@kirkland.com

312 861-2000  
www.kirkland.com

Facsimile:  
312 861-2200  
Dir. Fax: 312 861-2200

October 19, 2005

***Via Federal Express***

Marion C. Fairey, Jr., Esq.  
Speights & Runyan  
200 Jackson Avenue, East  
P.O. Box 685  
Hampton, SC 29924

Re: ***W.R. Grace & Co. Bankruptcy***

Dear Mr. Fairey:

This letter is in response to your September 23, 2005 request for documents relating to prior adjudications and settlements of your firm's asbestos property damage claims. As you know, Grace objected to eighteen Speights & Runyan claims as previously adjudicated. (See 15th Omnibus Objection Exhibit B-1) Documents relating to these prior adjudications are enclosed (Bates Range 1-164).

As you also know, Grace objected to forty Speights & Runyan claims as previously settled. (See 15th Omnibus Objection Exhibit B-2) After a careful review of the relevant settlement agreements, we have determined that most of them both (1) contain a confidentiality provision and (2) are for a lawsuit where Speights & Runyan had no involvement. Grace cannot produce these agreements unless and until you obtain consent from the appropriate parties.

The six settlement agreements (for seven claims) that Grace is permitted to produce and related documents are enclosed (Bates Range 165-436). For your convenience, I have also enclosed a chart that lists all of the Speights & Runyan claims that Grace has objected to as previously settled. For each claim, the chart has an entry describing the applicable settlement agreement and, if the agreement was withheld due to confidentiality, the name and address of the person you would need to contact to request a waiver of confidentiality.

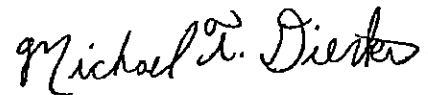
Finally, to answer your question regarding the Canadian claims, Grace expects the Canadian claimants to respond to its objections even though the merits of their claims ultimately will be adjudicated in Canada. The Court will need to address the Canadian claims as part of the estimation process.

KIRKLAND & ELLIS LLP

Marion C. Fairey, Jr., Esq.  
October 19, 2005  
Page 2

Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Michael T. Dierkes".

Michael T. Dierkes

MTD

**PREVIOUSLY SETTLED SPEIGHTS & RUNYAN CLAIMS**

<b>Claimant and Claim Number</b>	<b>Settlement Name and Date</b>	<b>Status</b>	<b>Contact(s)</b>
Bell Telephone Addition (11708)	Mountain States Telephone and Telegraph Company d/b/a/ US West Communications, Inc. v. W.R. Grace & Co.-Conn., and United States Gypsum, U.S. Dist. Court, CO, No 86-N-1928 (3/29/1994)	Withheld. Settlement has confidentiality provision (§ 14) and S&R was not involved in the litigation.	Richard M. Foster, Esq. Cockrell, Quinn & Creighton, 1700 Broadway, #1516, Denver, CO 80290-1501
Brady Boardman Connector (11058)	Central Wesleyan College v. W.R. Grace & Co., et al., U.S. District Court, District of SC, Charleston Division, No. 2:87-1860-8 (1/12/2000)	Produced.	N/A
British Columbia Institute of Technology (12355)	Payment No. 9990164 (8/17/1995)	Withheld. Settlement has confidentiality provision (§ 13.1) and S&R was not involved in the litigation.	David P. Church, Esq., Church & Company, The Grosvenor Bldg., Suite 900, 1040 West Georgia St., Vancouver, BC V6E 4H1
Century City Hospital (11080)	Century City Medical Plaza v. Carey Canada, et al., Superior Court of Los Angeles, CA; WEC 137 842 (3/24/1994)	Withheld. Settlement has confidentiality provision (§ 14) and S&R was not involved in the litigation.	Eric J. Schindler, Esq., The Schindler Law Firm, 384 Forest Ave., Ste. 20, Laguna Beach, CA; Hermez Moreno, Esq., 13428 Maxella Ave., #288, Marina Del Rey, CA 90292-5620
Cobble Hill Nursing Home FNA Congress NU (11097)	The City of New York v. AAER Sprayed Insulations, Inc., et al., New York Supreme Court, New York County, No. 19280/87 (9/28/1994)	Withheld. Settlement has confidentiality provision (§ 11) and S&R was not involved in the litigation.	Levy Phillips & Konisberg, LLP, 800 Third Avenue, 13 <sup>th</sup> Fl., New York, NY 10022

Claimant and Claim Number	Settlement Name and Date	Status	Contact(s)
D.L.P.S.T. Office Con. Building (10967)	Shel-Am Corp. and Aaron Muschel v. W.R. Grace & Co., et al., Court of Common Pleas, Allegheny County, PA, GD95- 13211; U.S. District Court, Western District, PA, No. 96- 353 (9/18/1996)	Withheld. Settlement has confidentiality provision (§ 13) and S&R was not involved in the litigation.	Aaron Musche, 332 Fifth Ave., McKeesport, PA 15132; Stuart M. Levine, Esq., Levine, Kundin & Sporrer, P.C., 711 Penn Avenue, Ste. 6, Pittsburgh, PA 15222
Daycare Center (11432)	The City of New York v. AAER Sprayed Insulations, Inc., et al., New York Supreme Court, New York County, No. 19280/87 (9/28/1994)	Withheld. Settlement has confidentiality provision (§ 11) and S&R was not involved in the litigation.	Levy Phillips & Konisberg, LLP, 800 Third Avenue, 13 <sup>th</sup> Fl., New York, NY 10022
Earl K. Long Charity Hospital (11210)	Richard P. Ieyoub, Attorney General ex rel., State of Louisiana v. W.R. Grace & Co.-Conn., et al., 14 <sup>th</sup> Judicial District Court, Calcasieu Parish, LA, No. 95-3722 (8/14/2000)	Withheld. Settlement has confidentiality provision (§ 10(a)) and S&R was not involved in the litigation.	Honorable Charles C. Foti, Jr., Atty Gen'l for State of Louisiana, 1885 N. 3 <sup>rd</sup> St., Baton Rouge, LA 70802; Drew Ranier, Esq., Ranier, Gayle & Elliot, 1419 Ryan St., Lake Charles, LA 70601
Eastern Parkway Library (11431)	The City of New York v. AAER Sprayed Insulations, Inc., et al., New York Supreme Court, New York County, No. 19280/87 (9/28/1994)	Claim withdrawn.	N/A
Eden Park HHC FNA Eden Park Nursing Home (11091)	Eden Park Management, Inc. and Eden Park Health Services, Inc. v. W.R. Grace & Co.- Conn., U.S. District Court, VT, No. 5:92CV194 (7/26/1994)	Claim withdrawn.	N/A

Claimant and Claim Number	Settlement Name and Date	Status	Contact(s)
Eden Park Nursing Home (11417)	Eden Park Management, Inc. and Eden Park Health Services, Inc. v. W.R. Grace & Co.- Conn., U.S. District Court, VT, No. 5:92CV194 (7/26/1994)	Claim withdrawn.	N/A
Eden Park Nursing Home (11429)	Eden Park Management, Inc. and Eden Park Health Services, Inc. v. W.R. Grace & Co.- Conn., U.S. District Court, VT, No. 5:92CV194 (7/26/1994)	Claim withdrawn.	N/A
Fraser Health Authority (12299)	Payment No. 9990164 (8/17/1995)	Withheld. Settlement has confidentiality provision (§ 13.1) and S&R was not involved in the litigation.	David P. Church, Esq., Church & Company, The Grosvenor Bldg., Suite 900, 1040 West Georgia St., Vancouver, BC V6E 4H1
Geauga Community Hospital (11157)	Ohio Hospital Association, et al. v. Armstrong World Industries, Inc., et al., Cuyahoga County Court of Common Pleas, OH, No. 187471 (9/00/1999)	Withheld. Settlement has confidentiality provision (§ 11) and S&R was not involved in the litigation.	Kenneth B. McClain, Humphrey, Farrington & McClain, 221 West Lexington, Suite 400, Independence, MO 64051

Claimant and Claim Number	Settlement Name and Date	Status	Contact(s)
Howland Hook Terminal (11004)	The Port Authority of New York and New Jersey, et al. v. Allied Corporation, et al., Southern District of New York, 91 Civ. 0310 (CLB) (MDF); W.R. Grace & Co.-Conn. v. The Port Authority of New York and New Jersey, et al., Southern District of New York, 9	Claim withdrawn.	N/A
Illinois Masonic Hospital (11234)	Illinois Masonic Hospital v. A.C. & S, Inc., Circuit Court of Cook County, IL, No. 90-L-2366 (6/26/2000)	Withheld. Settlement has confidentiality provision (§ 16) and S&R was not involved in the litigation.	Cooney & Conway, 120 North LaSalle Street, 30 <sup>th</sup> Floor, Chicago, IL 60602
Independence Sanitarium (10794)	Independence Regional Health Center, et al. v. United State Gypsum Company, et al., U.S. District Court, Western District of MO, No. 89-4156-CV-C-5 (7/25/1990)	Withheld. Settlement has confidentiality provision (§ 12) and S&R was not involved in the litigation.	Kenneth B. McClain, Esq., Humphrey, Farrington & McClain, P.C., 221 W. Lexington, suite 400, Independence, MO 64051
Joseph Magnin Store (10685)	South Coast Plaza v. A.D. Hoppe, Superior Court of CA, Los Angeles County, No. C728911 (6/1/1993)	Withheld. Settlement has confidentiality provision (§ 13) and S&R was not involved in the litigation.	Lawrence A. Cox, Esq., Arnold & Porter LLP, 44 <sup>th</sup> Fl., 777 So. Figueroa St., Los Angeles, CA 90017-2513
Marine Research Building (10861)	State of South Carolina v. W.R. Grace & Co.-Conn., et al., U.S. District Court of South Carolina, Columbia Division, No. 3:87-2879-0 (11/17/1994)	Claim withdrawn.	N/A

Claimant and Claim Number	Settlement Name and Date	Status	Contact(s)
Moundsville Housing Authority (6854)	In re State of West Virginia Public Building Asbestos Litigation, Circuit Court of Monongalia County, W. VA., No. 86-C-458 (5/5/1997, signed in counterparts)	Withheld. Settlement has confidentiality provision (§ 3) and S&R was not involved in the litigation.	Edward J. Westbrook, Esq., Richardson, Patrick, Westbrook & Brickman LLC, 174 E. Bay St., Charleston, SC 29402
Mountain Bell (11536)	Mountain States Telephone and Telegraph Company d/b/a/ U S West Communications Inc. v. W.R. Grace & Co.-Conn., and United States Gypsum, U.S. District Court, CO, No. 88-N-1928 (3/29/1994)	Withheld. Settlement has confidentiality provision (§ 14) and S&R was not involved in the litigation.	Richard M. Foster, Esq. Cockrell, Quinn & Creighton, 1700 Broadway, #1516, Denver, CO 80290-1501
Mountain States Telephone Company (11707)	Mountain States Telephone and Telegraph Company d/b/a/ U S West Communications Inc. v. W.R. Grace & Co.-Conn., and United States Gypsum, U.S. District Court, CO, No. 88-N-1928 (3/29/1994)	Withheld. Settlement has confidentiality provision (§ 14) and S&R was not involved in the litigation.	Richard M. Foster, Esq. Cockrell, Quinn & Creighton, 1700 Broadway, #1516, Denver, CO 80290-1501
New Municipal Building (11595)	City of Poughkeepsie v. W.R. Grace & Co., Sargent-Webster-Crenshaw and Gindele & Johnson, P.C. and Charles Slutsky d/b/a I. & O.A. Slutsky, Inc., Supreme Court of New York, Dutchess County, No. 1348/87 (1/4/1995)	Produced.	N/A



Claimant and Claim Number	Settlement Name and Date	Status	Contact(s)
New York Telephone Building (10720)	New York Telephone Company v. AAER Sprayed Insulations, Inc., et al., Supreme Court of the State of New York, County of New York, No. 17280/87 (9/22/1998)	Withheld. Settlement has confidentiality provision (§ 5) and S&R was not involved in the litigation.	Henry Gluckstern, Esq., Lee S. Kriendler, Esq., Kreindler & Kreindler, 100 Park Ave., New York, NY 10017-5590
New York Telephone Company (11049)	New York Telephone Company v. AAER Sprayed Insulations, Inc., et al., Supreme Court of the State of New York, County of New York, No. 17280/87 (9/22/1998)	Withheld. Settlement has confidentiality provision (§ 5) and S&R was not involved in the litigation.	Henry Gluckstern, Esq., Lee S. Kriendler, Esq., Kreindler & Kreindler, 100 Park Ave., New York, NY 10017-5590
Pavillion Center (10752)	The State of Vermont v. W.R. Grace & Co.-Conn., Washington Superior Court, No. S248-90 WnC (11/23/1992)	Produced.	N/A
Salem Hospital (11461)	Ohio Hospital Association, et al. v. Armstrong World Industries, Inc., et al., Cuyahoga County Court of Common Pleas, OH, No. 187471 (5/26/1998)	Claim withdrawn.	N/A
Shadyside Hospital (10999)	Shadyside Hospital v. W.R. Grace & Co.-Conn. and Armstrong World Industries, Inc., Court of Common Pleas, Allegheny County, PA, No. GD92-6664 (3/25/1994)	Withheld. Settlement has confidentiality provision (§ 13) and S&R was not involved in the litigation.	Jon A. Preiksats, Esq., VP, General Counsel & Sec'y, Shadyside Hospital, 5230 Centre Ave., Pittsburgh, PA 15232

Claimant and Claim Number	Settlement Name and Date	Status	Contact(s)
Sioux Valley Hospital (11447)	Sioux Valley Hospital Association v. W.R. Grace & Co.-Conn., U.S. District Court of SD, Southern Division, No. 92-4081 (8/12/1994)	Produced.	N/A
Spanish Pavillion (10698)	One Broadway Hotel Venture, Host Marriott Corporation and Tecon Hotel Corporation v. W.R. Grace & Co., W.R. Grace & Co.-Conn. and US Mineral Products Company, Circuit Court of St. Louis Co., MO, No. 679607 (7/31/1997)	Claim withdrawn.	N/A
St. Joseph's Hospital (11439)	Lorain Community/St. Joseph Regional Health Center v. W.R. Grace & Co.-Conn., U.S. District Court, Northern District of OH, Eastern Division, No. 1:95CV1209 (3/00/1998)	Produced.	N/A
St. Thomas Episcopal Church Inc. (6649)	In re School Asbestos Litigation, U.S. District Court, Eastern District of PA, No. 83-0268 (8/5/1994)	Produced.	N/A
Stadium in Storm Lake (11154)	Central Wesleyan College v. W.R. Grace & Co., et al., U.S. District Court, District of SC, Charleston Division, No. 2:87-1860-8 (1/12/2000)	Claim withdrawn.	N/A

Claimant and Claim Number	Settlement Name and Date	Status	Contact(s)
Telephone Building (10713)	New York Telephone Company v. AAER Sprayed Insulations, Inc., et al., Supreme Court of the State of New York, County of New York, No. 17280/87 (9/22/1998)	Withheld. Settlement has confidentiality provision (§ 5) and S&R was not involved in the litigation.	Henry Gluckstern, Esq., Lee S. Kriendler, Esq., Kreindler & Kreindler, 100 Park Ave., New York, NY 10017-5590
Transamerica (10990)	Transamerica Insurance Corporation of California v. W.R. Grace & Co.-Conn, Northern District, CA, No. C94-408-3(VRW) (12/9/1996)	Withheld. Settlement has confidentiality provision (§ 3) and S&R was not involved in the litigation.	Edward J. Westbrook, Esq., Richardson, Patrick, Westbrook & Brickman, LLC, 174 E. Bay St., Charleston, SC 29402
Trenty Athletic Center (11060)	Central Wesleyan College v. W.R. Grace & Co., et al., U.S. District Court, District of SC, Charleston Division, No. 2:87-01860-8 (1/12/2000)	Claim withdrawn.	N/A
Union Bank Building (10663)	NBD Bank, N.A. v. W.R. Grace & Co.-Conn., U.S. District Court, Eastern District, MI, No. CV60111AA; 6 <sup>th</sup> Cir., No. 95-2255 (5/31/1997, signed in counterparts)	Withheld. Settlement has confidentiality provision (§ 18) and S&R was not involved in the litigation.	Kenneth B. McClain, Esq., Humphrey, Farrington & McClain, P.C., 221 W. Lexington, Suite 400, Independence, MO 64051
White Pigment Corp. (10751)	White Pigment Corporation v. W.R. Grace & Co., Addison Superior Court, Addison County, VT, No. S209-88Ac (8/19/1991)	Withheld. Settlement has confidentiality provision (§ 9) and S&R was not involved in the litigation.	Paul Frank & Collins, One Church St., Burlington, VT 05402-1307

Claimant and Claim Number	Settlement Name and Date	Status	Contact(s)
Wildlife Building- Near VPA Coliseum (10591)	Central Wesleyan College v. W.R. Grace & Co., et al., U.S. District Court, District of SC, Charleston Division, No. 2:87- 1860-8 (1/12/2000)	Claim withdrawn.	N/A
Yankton High School Historic Dist (6635)	In re School Asbestos Litigation, U.S. District Court, Eastern District of PA, No. 83- 0268 (8/5/1994)	Produced.	N/A